

Before the  
**Federal Communications Commission**  
Washington DC 20554

In the matter of:

<b>Objections to Recommendations )</b>	<b>RM-11306</b>
<b>Made in Notice of Ex Parte )</b>	
<b>Presentation by ARRL )</b>	

March 7, 2007

I, Christopher A. Johnson, WA2ZDY, am an amateur radio licensee. My comments on this proposal will not be as eloquent or detailed as those of my peers, but they are no less valid. I also leave the technical discussions to those better qualified than I.

There is no practical way to permit “semi-automatic” operation of any station on the HF spectrum without an undue potential for interference. A remote operator who cannot monitor a frequency from the location of the transmitter before causing cannot know whether or not that transmitter will cause interference to already ongoing communications on the frequency. Such operation flies in the face of nearly a century of amateur operating practice. There is no reason to allow this to happen.

Many users of these internet gateway systems that would make use of said “semi-automatic” controlled stations are yachters at sea. These operations are largely in violation of 47CFR97.113 (5) “Communications, on a regular basis, which could reasonably be furnished alternatively through other radio services.” There are commercial email services, “Sailmail” is one that comes to mind, that serve the ocean going community. There is no justification for changing Part 97 to better accommodate these operations that violate the spirit, if not the words of these regulations, particularly at the expense of other amateurs who are operating within the spirit of the amateur service as defined in 97.1.

This same argument is applied to the proposal by ARRL that these "internet gateway/email" operations be permitted on all frequencies where data emissions are permitted. Again, there is no reason to further accommodate operations that are already in violation of the rules.

I urge the dismissal of this latest proposal by ARRL. It does not serve amateur radio in general.

Respectfully submitted,

A handwritten signature in cursive script that reads "Christopher A. Johnson". The signature is written in black ink and is positioned below the "Respectfully submitted," text.

Christopher A. Johnson